

any of the plaintiffs' rights under the Federal or New York Constitutions or Statutes had been violated.

A review of the officer's Central Personnel Index (CPI) revealed the following:

1. On October 17, 2013 Luis Cotes had a substantiated departmental investigation for failing to safeguard his ballistic vest. He pled guilty and forfeited one day.
2. On October 11, 2018 Luis Cotes had a substantiated departmental investigation for failing to safeguard his firearm and missing firearm. He pled guilty and forfeited twenty vacation days.

The People reserve the right to move *in limine* to preclude reference to this information, or otherwise to object to its use or introduction into evidence during trial.

Should you wish to discuss this matter, please do not hesitate to call me at [REDACTED] [REDACTED] Ext.] during office hours.

Sincerely,

[REDACTED]
[REDACTED]

cc: Clerk of the Court